

LUKE A. BUSBY, ESQ
Nevada Bar No. 10319
LUKE ANDREW BUSBY, LTD.
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Reno, Nevada 89509
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luke@lukeandrewbusbyltd.com

Designated Resident Nevada Counsel for Plaintiff

Sarah Grady*
Loevy & Loevy
311 N. Aberdeen St., 3rd Fl.
Chicago, IL 60607
O: 312.243.5900
sarah@loevy.com

David B. Owens*
Loevy & Loevy
100 S. King St., St. 100
Seattle, WA 98104
O: 312-243-5900
david@loevy.com

*Verified petitions for permission to practice forthcoming
*Counsel for Plaintiff Craig Farah, Personal Representative
of the Estate of Nicholas Farah*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

CRAIG FARAH, Personal
Representative of the ESTATE OF
NICHOLAS FARAH,

Plaintiff,

vs.

No. 2:20-cv-00604

LAS VEGAS METROPOLITAN
POLICE DEPARTMENT; RICHARD
NEWMAN; SAMUEL MENDOZA;
AARON MOSELY; JEREMY
STEWART; CHRISTY SNAPP;
GABRIEL VILLANUEVA; KIM SOFFE;
and COLLIN PETRIELIUS,

Defendants.

**PLAINTIFF'S UNOPPOSED
MOTION FOR LEAVE TO FILE
INSTANTER VERIFIED PETITION
FOR DAVID OWENS AND MOTION
FOR EXTENSION OF TIME TO
FILE VERIFIED PETITION FOR
SARAH GRADY**

Now comes Plaintiff, Craig Farah, as Personal Representative of the Estate of Nicholas Farah, by and through his undersigned counsel, and respectfully requests that this Court permit Plaintiff's attorney, David Owens, leave to file his verified petition for permission to practice in this case *instante*. Plaintiff further

1 requests an extension of time to June 11 to file Sarah Grady's verified petition for
2 permission to practice in this case. In support of his requests, Plaintiff states as
3 follows:

4 1. Plaintiff has filed a 42 U.S.C. § 1983 lawsuit against the Las Vegas
5 Metropolitan Police Department and others over the death of his son, Nicholas
6 Farah, at the Clark County Detention Center (CCDC) on March 31, 2019. Dkt. 1.

7 2. Plaintiff is represented in this lawsuit by David Owens and Sarah
8 Grady at Loevy & Loevy, a civil rights law firm headquartered in Chicago. They are
9 not licensed to practice law in the State of Nevada, but are working with the
10 undersigned as Designated Resident Nevada Counsel for Plaintiff.

11 3. This Court previously ordered counsel to file verified petitions by May
12 16, 2020. Dkt. 3. Unfortunately, because of difficulties due to the COVID-19
13 pandemic, and uncertainty regarding counsel's ability to obtain the required
14 notarization of the verified petitions while under stay-at-home orders, counsel was
15 unable to file their petitions by the May 16 deadline.

16 4. Counsel has since resolved these issues, and been able to begin
17 completing the verified petitions. Accordingly, Plaintiff has attached to this motion
18 the required verified petition for permission to practice in this case for David
19 Owens. Ex. A.

20 5. Unfortunately, Sarah Grady's verified petition is not yet complete, as
21 she is still waiting to receive a certificate of good standing from the State of New
22 York, one of the two states where she is licensed to practice law. Accordingly,
23 Plaintiff respectfully requests a brief extension of time, up to and including June 11,
24 to provide Ms. Grady's verified petition.

25 6. Counsel for Plaintiff has conferred with counsel for the Defendants
26 (excepting Defendant Collin Petrieliuss who has not yet been served). Counsel for
27 Defendants report that they do not oppose Plaintiff's request.
28

WHEREFORE, Plaintiff respectfully requests that this Court permit Plaintiff's attorney, David Owens, leave to file his verified petition for permission to practice in this case *instantly*, and to permit Plaintiff's attorney, Sarah Grady, a brief extension of time to June 11 to file her verified petition for permission to practice.

Dated: May 28, 2020

Respectfully submitted,

CRAIG FARAH

By: /s/ Luke A Busby
Designated Resident Nevada Counsel
for Plaintiff

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*Verified petitions for permission to practice forthcoming
*Counsel for Plaintiff Craig Farah, Personal Representative
of the Estate of Nicholas Farah*

CERTIFICATE OF SERVICE

I, Luke A. Busby, an attorney, hereby certify that on May 27, 2020, I filed the foregoing via CM/ECF, which effected service on all counsel of record. I further certify that I will ensure that Defendant Collin Petrieliuss receives a copy of the foregoing at the time that he is served with notice of this lawsuit pursuant to Rule 4 of the Federal Rules of Civil Procedure.

/s/ Luke A Busby
Designated Resident Nevada Counsel
for Plaintiff

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Nevada Bar No. 10319
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Designated Resident Nevada Counsel for Plaintiff

Sarah Grady*
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*Counsel for Plaintiff Craig Farah, Personal Representative
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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

CRAIG FARAH, Personal
Representative of the ESTATE OF
NICHOLAS FARAH,

Plaintiff,

vs.

No. 2:20-cv-00604

LAS VEGAS METROPOLITAN
POLICE DEPARTMENT; RICHARD
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STEWART; CHRISTY SNAPP;
GABRIEL VILLANUEVA; KIM SOFFE;
and COLLIN PETRIELIUS,

Defendants.

**PLAINTIFF'S LIST OF EXHIBITS
FOR UNOPPOSED MOTION FOR
LEAVE TO FILE *INSTANTER*
VERIFIED PETITION FOR DAVID
OWENS AND MOTION FOR
EXTENSION OF TIME TO
FILE VERIFIED PETITION FOR
SARAH GRADY**

No.	Description
A	David Owens Verified Petition

1 Dated: May 28, 2020

2 Respectfully submitted,

3 CRAIG FARAH

4 By: /s/ Luke A Busby
5 Designated Resident Nevada Counsel
6 for Plaintiff

7 LUKE A. BUSBY, ESQ
8 Nevada Bar No. 10319
9 LUKE ANDREW BUSBY, LTD.
10 316 California Ave # 82
11 Reno, Nevada 89509
12 O: 775.453.0112

13 luke@lukeandrewbusbyltd.com
14 *Designated Resident Nevada Counsel for Plaintiff*

15 Sarah Grady*
16 Loevy & Loevy
17 311 N. Aberdeen St., 3rd Fl.
18 Chicago, IL 60607
19 O: 312.243.5900
20 sarah@loevy.com

21 David B. Owens*
22 Loevy & Loevy
23 100 S. King St., St. 100
24 Seattle, WA 98104
25 O: 312-243-5900
26 david@loevy.com

27 *Verified petitions for permission to practice forthcoming
28 *Counsel for Plaintiff Craig Farah, Personal Representative
of the Estate of Nicholas Farah*

18 CERTIFICATE OF SERVICE

19 I, Luke A. Busby, an attorney, hereby certify that on May 27, 2020, I filed
20 the foregoing via CM/ECF, which effected service on all counsel of record. I further
21 certify that I will ensure that Defendant Collin Petrielijs receives a copy of the
22 foregoing at the time that he is served with notice of this lawsuit pursuant to Rule 4
23 of the Federal Rules of Civil Procedure.

24 /s/ Luke A Busby
25 Designated Resident Nevada Counsel
26 for Plaintiff

Exhibit A

Verified Petition of David Owens

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Craig Farah, Personal Representative of the
Estate of Nicholas Farah
Plaintiff(s),
vs.
LVPMD, et al.,
Defendant(s).

Case #20-cvcv-604

**VERIFIED PETITION FOR
PERMISSION TO PRACTICE
IN THIS CASE ONLY BY
ATTORNEY NOT ADMITTED
TO THE BAR OF THIS COURT
AND DESIGNATION OF
LOCAL COUNSEL**

FILING FEE IS \$250.00

David Owens, Petitioner, respectfully represents to the Court:
(name of petitioner)

1. That Petitioner is an attorney at law and a member of the law firm of

Loevy & Loevy

(firm name)

with offices at 100 S. King Street #100-748,
(street address)

Seattle, Washington, 98104,
(city) (state) (zip code)

312-243-5900, david@loevy.com
(area code + telephone number) (Email address)

2. That Petitioner has been retained personally or as a member of the law firm by
Plaintiff, Craig Farah to provide legal representation in connection with
[client(s)]

the above-entitled case now pending before this Court.

3. That since 5/9/2013, Petitioner has been and presently is a
(date)
member in good standing of the bar of the highest Court of the State of Illinois
(state)
where Petitioner regularly practices law. Petitioner shall attach a certificate from the state bar or
from the clerk of the supreme court or highest admitting court of each state, territory, or insular
possession of the United States in which the applicant has been admitted to practice law certifying
the applicant's membership therein is in good standing.

4. That Petitioner was admitted to practice before the following United States District
Courts, United States Circuit Courts of Appeal, the Supreme Court of the United States and Courts
of other States on the dates indicated for each, and that Petitioner is presently a member in good
standing of the bars of said Courts.

Court	Date Admitted	Bar Number
State of California	1/13/2011	275030
State of Washington	9/5/2018	53856
7th Circuit Court of Appeals	5/11/2011	none
US District Court for the ND Illinois	5/9/2013	none
US District Court for the ND Indiana	1/11/2013	none
US District Court for the CD Illinois	7/18/2014	none
US District Court for the ND Ohio	1/25/2015	none
US District Court for the WD Wisconsin	8/7/2015	none
US District Court of ED Wisconsin	6/23/2017	none
US District Court for the SD Texas	11/23/2015	none
Central District of California	1/14/2016	none
Western District of Washington	9/5/2018	none
5th Circuit Court of Appeals	10/30/2018	none
9th Circuit Court of Appeals	9/26/2018	none

5. That there are or have been no disciplinary proceedings instituted against petitioner,
nor any suspension of any license, certificate or privilege to appear before any judicial, regulatory
or administrative body, or any resignation or termination in order to avoid disciplinary or
disbarment proceedings, except as described in detail below:

none

6. That Petitioner has never been denied admission to the State Bar of Nevada. (Give particulars if ever denied admission):

none

7. That Petitioner is a member of good standing in the following Bar Associations.

none

8. Petitioner has filed application(s) to appear as counsel under Local Rule IA 11-2 (formerly LR IA 10-2) during the past three (3) years in the following matters: (State "none" if no applications.)

Date of Application	Cause	Title of Court Administrative Body or Arbitrator	Was Application Granted or Denied
8/26/2016	Woods v. Reno	US District Court of NV	Granted
8/28/2019	Lobato v. LVMPD	US District Court of NV	Granted

(If necessary, please attach a statement of additional applications)

9. Petitioner consents to the jurisdiction of the courts and disciplinary boards of the State of Nevada with respect to the law of this state governing the conduct of attorneys to the same extent as a member of the State Bar of Nevada.

10. Petitioner agrees to comply with the standards of professional conduct required of the members of the bar of this court.

11. Petitioner has disclosed in writing to the client that the applicant is not admitted to practice in this jurisdiction and that the client has consented to such representation.

1 That Petitioner respectfully prays that Petitioner be admitted to practice before this Court
 2 FOR THE PURPOSES OF THIS CASE ONLY.

3
 4 STATE OF washington }
 5 COUNTY OF king }

Petitioner's signature

7 David B. Owens, Petitioner, being first duly sworn, deposes and says:

8 That the foregoing statements are true.

Petitioner's signature

10 Subscribed and sworn to before me this

11 26th day of May, 2020.

13 Notary Public or Clerk of Court

14 Tiamah D. Erickson, notary public



16 **DESIGNATION OF RESIDENT ATTORNEY ADMITTED TO**
 17 **THE BAR OF THIS COURT AND CONSENT THERETO.**

18 Pursuant to the requirements of the Local Rules of Practice for this Court, the Petitioner
 19 believes it to be in the best interests of the client(s) to designate Luke Busby,
 20 (name of local counsel)
 21 Attorney at Law, member of the State of Nevada and previously admitted to practice before the
 22 above-entitled Court as associate resident counsel in this action. The address and email address of
 23 said designated Nevada counsel is:

23 316 California Ave #82

(street address)

24 Reno

(city)

Nevada

(state)

89509

(zip code)

26 775-453-0112

(area code + telephone number)

luke@lukeandrewbusbyltd.com

(Email address)

7 The undersigned party(ies) appoint(s) Luke A. Busby as
 8 his/her/their Designated Resident Nevada Counsel in this case.

(type or print party name, title)

The undersigned hereby consents to serve as associate resident Nevada counsel in this case.

10319	luke@lukeandrewbusbyltd.com
Bar number	Email address

DATED this 18th day of June, 2020.

Rev. 5/16


Certificate of Admission To the Bar of Illinois

I, Carolyn Taft Grosboll, Clerk of the Supreme Court of Illinois, do hereby certify that

David Benjamin Owens

has been duly licensed and admitted to practice as an Attorney and Counselor at Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on 05/09/2013 and is in good standing, so far as the records of this office disclose.

IN WITNESS WHEREOF, I have hereunto
subscribed my name and affixed the
seal of said Court, this 8th day of
April, 2020.



Clerk,
Supreme Court of the State of Illinois



Supreme Court of California

JORGE E. NAVARRETE

Clerk and Executive Officer of the Supreme Court

CERTIFICATE OF THE CLERK OF THE SUPREME COURT

OF THE

STATE OF CALIFORNIA

DAVID BENJAMIN OWENS


I, JORGE E. NAVARRETE, Clerk/Executive Officer of the Supreme Court of the State of California, do hereby certify that DAVID BENJAMIN OWENS, #275030, was on the 3rd day of January 2011, duly admitted to practice as an attorney and counselor at law in all the courts of this state, and is now listed on the Roll of Attorneys as a member of the bar of this state in good standing.

*Witness my hand and the seal of the court
on the 21st day of February 2020.*

JORGE E. NAVARRETE

Clerk/Executive Officer of the Supreme Court

By: _____


C. Wong, Senior Deputy Clerk

